

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

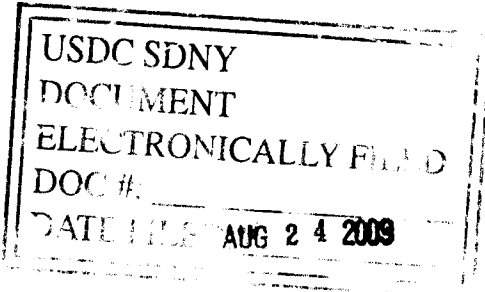
- - - - - X
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UNITED STATES OF AMERICA :
:
- v. - :
:
DIN CELAJ and :
RABINDRA SINGH, :
a/k/a "Rob," :
:
Defendants. :
:
- - - - - X

INDICTMENT

S6 07 Cr. 837 (RPP)

COUNT ONE

The Grand Jury charges:



1. From at least in or about early 2007 until on or about July 8, 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, together with others known and unknown, unlawfully, willfully and knowingly combined, conspired, confederated and agreed together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, DIN CELAJ, and others known and unknown, agreed to rob money and drugs from persons engaged in narcotics trafficking in the Bronx and

Manhattan, New York, and various locations in Long Island, New York.

(Title 18, United States Code, Section 1951.)

COUNT TWO

The Grand Jury further charges:

2. In or about April or May 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, unlawfully, willfully and knowingly did commit and attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, DIN CELAJ posed as a police officer and robbed money and marijuana from a drug dealer in the Bronx, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT THREE

The Grand Jury further charges:

3. In or about April or May 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, unlawfully, willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the crime charged in Count Two of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use,

carrying and possession of a firearm, which was brandished.

(Title 18, United States Code,
Sections 924(c)(1)(A)(ii) and 2.)

COUNT FOUR

The Grand Jury further charges:

4. In or about May or June 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, unlawfully, willfully and knowingly did attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would thereby have obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, DIN CELAJ posed as a police officer and attempted to rob a drug dealer known as "Bobby Brown" in Long Island, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FIVE

The Grand Jury further charges:

5. In or about May or June 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, unlawfully, willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the crime charged in Count Four of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the

use, carrying and possession of a firearm, which was brandished.

(Title 18, United States Code,
Sections 924(c)(1)(A)(ii), (c)(1)(C), and 2.)

COUNT SIX

The Grand Jury further charges:

6. In or about May or June 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, unlawfully, willfully and knowingly did attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would thereby have obstructed, delayed, and affected commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, DIN CELAJ posed as a police officer and attempted to rob a drug dealer who lived near Sayville, New York.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT SEVEN

The Grand Jury further charges:

7. In or about May or June 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, unlawfully, willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the crime charged in Count Six of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use,

carrying and possession of a firearm.

(Title 18, United States Code,
Sections 924(c)(1)(A)(i), (c)(1)(C), and 2.)

COUNT EIGHT

The Grand Jury further charges:

8. In or about May or June 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, unlawfully, willfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, DIN CELAJ robbed the driver of a tractor trailer of the proceeds of the sale of marijuana at a truck stop in Pennsylvania.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT NINE

The Grand Jury further charges:

9. In or about May or June 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, unlawfully, willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit, the crime charged in Count Eight of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the

use, carrying and possession of a firearm.

(Title 18, United States Code,
Sections 924(c)(1)(A)(i), (c)(1)(C), and 2.)

COUNT TEN

The Grand Jury further charges:

10. From at least in or about early 2007 until on or about July 8, 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, and others known and unknown, unlawfully, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

11. It was a part and an object of the conspiracy that DIN CELAJ, the defendant, and others known and unknown, would and did distribute and possess with intent to distribute, a controlled substance in violation of 21 U.S.C. § 841(a)(1).

12. The controlled substance involved in the offense was fifty kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of 21 U.S.C. § 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

COUNT ELEVEN

The Grand Jury further charges:

13. From at least in or about January 2007 until on or about July 8, 2007, in the Southern District of New York and elsewhere, DIN CELAJ and RABINDRA SINGH, a/k/a "Rob," the

defendants, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Sections 2312 and 2313 of Title 18, United States Code.

14. It was a part and an object of the conspiracy that DIN CELAJ and RABINDRA SINGH, a/k/a "Rob," the defendants, and others known and unknown, unlawfully, willfully and knowingly would and did transport in interstate commerce motor vehicles, knowing the same to have been stolen, in violation of Section 2312 of Title 18, United States Code.

15. It was further a part and an object of the conspiracy that DIN CELAJ and RABINDRA SINGH, a/k/a "Rob," the defendants, and others known and unknown, unlawfully, willfully and knowingly would and did receive, possess, conceal, store, barter, sell, and dispose of motor vehicles, which had crossed a State boundary after being stolen, knowing the same to have been stolen, in violation of Section 2313 of Title 18, United States Code.

OVERT ACTS

16. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about February 16, 2007, DIN CELAJ and RABINDRA SINGH, a/k/a "Rob," the defendants, brought a stolen Lexus RX-330 to a location in the Bronx, New York.

b. On or about February 20, 2007, RABINDRA SINGH, a/k/a "Rob," the defendant, provided the key to a stolen Mercedes E320 to an undercover New York City Police detective at a location in the Bronx, New York.

c. On May 23, 2007, DIN CELAJ, the defendant, drove a stolen Lexus GS-470 (the "Lexus GS-470") to a location in the Bronx, New York.

d. On May 23, 2007, DIN CELAJ, the defendant, sold the Lexus GS-470 in Hackensack, New Jersey.

(Title 18, United States Code, Section 371.)

COUNT TWELVE

The Grand Jury further charges:

17. From at least in or about January 2007 until on or about July 8, 2007, in the Southern District of New York and elsewhere, DIN CELAJ and RABINDRA SINGH, a/k/a "Rob," the defendants, unlawfully, willfully and knowingly would and did transport in interstate commerce motor vehicles, knowing the same to have been stolen, to wit, CELAJ and SINGH stole numerous automobiles which were subsequently transported to, and sold in, New Jersey and elsewhere.

(Title 18, United States Code, Sections 2312 and 2.)

COUNT THIRTEEN

The Grand Jury further charges:

18 From at least in or about January 2007 until in or about August 2007, in the Southern District of New York and elsewhere, DIN CELAJ, the defendant, and others known and unknown, unlawfully, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Section 1341 of Title 18, United States Code.

19. It was a part and an object of the conspiracy that DIN CELAJ, the defendant, and others known and unknown, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, matters and things whatever to be sent and delivered by the Postal Service, and would and did deposit and cause to be deposited matters and things whatever to be sent and delivered by private and commercial interstate carriers, and would and did take and receive therefrom, such matters and things, and would and did knowingly cause to be delivered by mail and such carriers according to the direction thereon, and at the place at which

they were directed to be delivered by the persons to whom they were addressed such matters and things, to wit, DIN CELAJ, and others known and unknown, devised a scheme to defraud insurance companies of insurance payments by mailing false claims of car theft, in violation of Title 18, United States Code, Section 1341.

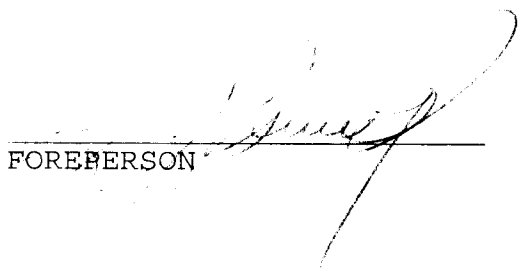
OVERT ACTS

20. In furtherance of the conspiracy to and effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about May 1, 2007, DIN CELAJ, the defendant, sold a car belonging to a co-conspirator not named herein ("CC-1") to an undercover New York City Police detective.

b. On or about July 16, 2007, a co-conspirator not named herein ("CC-2") mailed an affidavit of theft to Progressive Insurance Company.

(Title 18, United States Code, Section 1349.)



FOREPERSON



PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

- v -

**DIN CELAJ, and
RABINDRA SINGH,
a/k/a "Rob,"**

Defendants.

INDICTMENT

S6 07 Cr. 837 (RPP)

Title 18, United States Code, Sections 1951, 924,
371, 2312, 1349 and 2; Title 21, United
States Code, Section 846

PREET BHARARA
United States Attorney.

A TRUE BILL


Foreperson.

August 24, 2009
m.s.

Superseding indictment filed in SG 07CR
837
ELLIS, USMJ.